

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

JAMON HESTAND,
TDCJ No. 01343536,
Plaintiff,

V.

**TEXAS DEPARTMENT OF CRIMINAL
JUSTICE, ET. AL.,
Defendants.**

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**CIVIL ACTION No. 6:20-CV-00071**

## DEFENDANTS MOTION TO EXTEND DEADLINE TO FILE ANSWER

**TO THE HONORABLE UNITED STATES DISTRICT COURT MAGISTRATE JOHN D. LOVE**

Defendants Lorie Davis and Bobby Lumpkin (“Defendants”), by and through the Office of the Texas Attorney General, respectfully request a thirty (“30”) day extension of the deadline to file a responsive pleading to Plaintiff’s Amended Complaint and Response to Defendant’s Motion to Dismiss (Dkt. No. 20), filed January 15, 2021, from July 1, 2021 up to and including August 2, 2021. This is the first request for an extension of this deadline and comes before the deadline to file.

The Defendants do not make this request for any contumacious or dilatory purposes. Instead, counsel for the Defendants is and has been at trial all week on another matter, *Petry v. Texas Department of Criminal Justice*, Civil Action No. 1:18-cv-00373-AC, in the U.S.D.C., Eastern District of Texas, Beaumont Division. Extending the deadline here will not delay the proceedings. Rather, it will allow counsel time to confer with her clients and adequately respond to the instant litigation and to ease the burden on this Court by ensuring only justiciable claims go forward.

Undersigned counsel has conferred with Plaintiffs' counsel concerning this request via email on July 1, 2021. Plaintiff does not oppose this request.

**CONCLUSION**

Good cause exists to grant this request. The case is in its infancy and extending the reply deadline to provide enough time to evaluate and respond to this suit will streamline the initial stages of this litigation. Accordingly, the Defendants respectfully request that this Court extend the response deadline to August 2, 2021.

**Dated:** July 1, 2021.

Respectfully submitted.

**KEN PAXTON**  
Attorney General of Texas

**GRANT DORFMAN**  
First Assistant Attorney General

**BRENT WEBSTER**  
Deputy First Assistant Attorney General

**SHAWN COWLES**  
Deputy Attorney General for Civil Litigation

/s/ Courtney Corbello  
**COURTNEY CORBELLO**  
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**ATTORNEYS FOR DEFENDANTS DAVIS AND  
LUMPKIN**

**NOTICE OF ELECTRONIC FILING**

I, **COURTNEY CORBELLO**, Assistant Attorney General of Texas, certify that I have electronically submitted for filing, a true and correct copy of the above and foregoing in accordance with the Electronic Case Files system of the United States District Court for the Eastern District of Texas, on July 1, 2021.

/s/ Courtney Corbello  
**COURTNEY CORBELLO**  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, **COURTNEY CORBELLO**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served directly to all counsel of record by the Electronic Case Files System of the Eastern District of Texas on July 1, 2021.

/s/ Courtney Corbello  
**COURTNEY CORBELLO**  
Assistant Attorney General

**CERTIFICATE OF CONFERENCE**

I, **COURTNEY CORBELLO**, Assistant Attorney General of Texas, do hereby certify that I attempted to confer in good faith with plaintiff's counsel via email on July 1, 2021, concerning the relief sought in this motion, but did not receive a response. Therefore, counsel presumes Plaintiff is opposed.

/s/ Courtney Corbello  
**COURTNEY CORBELLO**  
Assistant Attorney General